

REMARKS

Claims 1-2 and 4-27 are pending in the current application. Claim 3 has been cancelled and claims 1, 4-5, 8-9, 16, 21 and 24-25 have been amended hereby. The amendments contain no new matter and are particularly supported in the specification at paragraphs [0041]-[0044] and in the drawings at FIGS. 3, 4, 7 and 8.

Claims 1-3, 6, 21-23 and 26 were rejected under 35 U.S.C. §102 as being anticipated by U.S. Patent No. 5,580,282 to Paterek. Amended claims 1 and 21 call for, among other things, a dielectric material "substantially filling" the cavity defined between the terminal assembly and the cluster block, and/or the free volume of the cluster block. The office action asserts that Paterek discloses such a dielectric material in FIG. 2 at 10. To the contrary, Paterek discloses only a protective coating 10 surrounding end portions of pins 7. See Paterek Col. 4 lines 11-12. The plain meaning of coating or coat is "a covering layer." See The Merriam-Webster Dictionary, Home and Office Edition, 1998, p. 100 (copy enclosed). In contrast, claim 1 requires that the dielectric material substantially fill the area, not simply coat the pins. The plain meaning of "filling" or "fill" is "to make or become full" or "to occupy fully." See The Merriam-Webster Dictionary, Home and Office Edition, 1998, p. 194 (copy enclosed). The coating 10 of Paterek does not substantially fill or substantially occupy fully the free volume of the cluster block or the cavity of the terminal assembly. As shown in FIG. 2, passages 12 are not substantially filled with material 10 but rather material 10 simply coats pins 15. Therefore, Paterek does not disclose or suggest a dielectric material substantially filling the free volume and/or the cavity. This is further supported by the previous office action dated November 7, 2003, in which Examiner states that "Paterek does not disclose a dielectric material filling the cavity." See Office Action, November 7, 2003, pg. 3, lines 3-4.

Further, amended claim 1 also calls for the cluster block including a means of ingress for the dielectric material to enter the cavity and/or free volume when the cluster block is fitted to the terminal body. Paterek discloses no such means. Once terminal assembly 2 of Paterek is connected to connector block 8, there is no means for a dielectric material to ingress into the cavity or free volume. For these reasons, claims 1 and 21 are not anticipated by, and are patentable over, Paterek. Claims 2-3, 6, 22-23 and 26, by way of their dependency on claims 1 and 21 are also not anticipated by, and are patentable over, Paterek.

Claims 1-27 were rejected under 35 U.S.C. §103 as unpatentable over Paterek in view of U.S. Patent Nos. 3,551,191 to Elbling et al.; 5,391,061 to Iizuka et al.; 5,364,283 to Katoh et al.; 6,132,251 to Onoda; 5,795,170 to Okabe; and/or 5,797,759 to Mattis et al.

As discussed above, amended claim 1 calls for a substantially solid dielectric material substantially filling the cavity and/or free volume, and the cluster block including a means of ingress for the dielectric material to enter the cavity and/or free volume when the cluster block is fitted to the terminal body. No combination of the cited references disclose, teach or suggest these features. As discussed above, Paterek does not disclose, teach or suggest a dielectric material substantially filling the cavity and/or free volume. Further, Paterek fails to disclose, teach or suggest the means for ingress. The office action asserts that Paterek discloses such a means for ingress in FIG. 1 at reference character 9. However, FIG. 1 shows connector block 8 defining passages 9, which house load wires 11 and communicatively connect to passageways 12 of block 8. See Paterek, Column 3, line 64 - Column 4, line 10; and FIGS. 1, 2 and 6. As illustrated in FIGS. 2 and 6 and discussed in the specification of Paterek, passageways 12 are sized to receive pins 7 in a press-fit engagement which serves to minimize leakage and, thus, would prevent an ingress of dielectric material. See Paterek Col. 5, lines 33-50; and FIGS. 2 and 6. As a result of the sealed engagement between pins 7 and passageways 12, passageways 9 cannot serve as a means for ingress of dielectric material into the free volume and cavity of block 8 and terminal assembly 2.

The remaining cited references, namely Elbling, Iizuka, Katoh, Onoda, Okabe and Mattis, also fail to disclose, teach or suggest providing the claimed dielectric material and the cluster block with a means for ingress for the dielectric material to enter the cavity and/or free volume when the cluster block is fitted to the terminal body.

Elbling only discloses providing a protective coating overlaying the bushing of the connector pin. See Elbling, Col. 2, lines 37-40. Elbling does not disclose the dielectric material substantially filling the cavity and/or free volume, nor does Elbling disclose a means of ingress after the terminal assembly is connected to the cluster block assembly.

Iizuka is cited for its use of a sealed housing and motor for a compressor, but Iizuka does not disclose, teach or suggest the claimed use of dielectric gel. Iizuka provides no motivation to combine with references using dielectric gel. Iizuka also fails to disclose the means of ingress.

Onoda discloses a sealing resin in the hood portion of the connector terminal assembly. Onoda does not teach or suggest a sealing resin in the free volume of the mating connector or cluster block assembly which, as is explicitly noted by Onoda, is not shown in the FIGS of Onoda. See Onoda, Col. 1, lines 33-37. Furthermore, Onoda fails to disclose, teach or suggest a means for ingress of the dielectric material into the cavity and/or free volume after the terminal assembly is connected to the mating connector, which again is not shown in the FIGS of Onoda. See Onoda, Col. 1, lines 33-37 and 49-52.

Similarly, Mattis discloses gel in only the terminal block 10 and not in module or cluster block 16. Furthermore, Mattis discloses no means for ingress of the dielectric material into the cavity and/or free volume after the terminal block is connected to the module. See Mattis, FIG. 1 and 4.

In Katoh , the disclosed device employs a grease to protect against high humidity. In order to allow the terminals to remain detachable from the housing, the grease does not cure to a substantially solid state. See col. 3, lines 66-68. Katoh does not disclose, teach or suggest a substantially solid dielectric material substantially filling the free volume and/or the cavity, as called for in claim 1. In fact, Katoh teaches away from such a material because the solid material would prevent the terminals from being detachable from the housing.

Finally, with respect to Okabe, the melted resin material 5 for waterproofing purposes is filled in the rear portion 4b of the terminal receiving chamber 4. See Okabe, Col. 4, lines 34-57. Chamber 4 is specifically designed such that front portion 4a is smaller in cross section than rear portion 4b. This design allows front portion 4a to cooperate with wall section 7 of female terminal 3 to prevent the liquid resin from flowing into front portion 4a and, thereby allows female terminal to remain flexible at spring piece 12. See Okabe, Col. 4, lines 34-57. Consequently, Okabe does not teach or suggest substantially filling the free volume and cavity with a substantially solid material. In fact, Okabe also teaches away from such a practice because it would eliminate the desired flexing of the female terminal.

For these reasons, no combination of the cited references would yield the invention of claim 1. Therefore, claim 1 is patentable over any combination of these references. Furthermore, by way of their dependency on claim 1, claims 2 and 4-8 are also patentable over any combination of these references.

Amended claim 9 calls for, among other things, an aperture defined in the cluster block and communicating with the cavity when the cluster block is fitted to the terminal body, and a liquid dielectric material being deposited into the cavity through the aperture and allowed to cure until substantially solid. For the same reasons discussed above with respect to the means for ingress and the substantially solid dielectric material, a combination of the cited references would not disclose all of the features of claim 9 and, therefore, claim 9, along with dependent claims 1-15, are patentable over the cited references.

Method claim 16, in its amended form, calls for the steps of substantially filling the free volume defined in the cluster block assembly with dielectric gel, substantially filling the cavity between the cluster block assembly and the terminal assembly with the dielectric gel, and allowing the gel to cure into a substantially solid state. For the same reasons discussed above, a combination of the cited references would not disclose all of the features of claim 16. For these reasons, claim 16 and its dependent claims 17-20 are patentable over the cited references.

Amended claim 21 calls for, among other things, a substantially solid dielectric material substantially filling the cavity of the terminal assembly and the free volume of the cluster block.

As discussed above, Paterek discloses only coating the end portions of the pins, not substantially filling the cavity and the free volume with a dielectric gel. Similarly, Elbling only discloses providing a protective coating overlaying the bushing of the connector pin. See Elbling, Col. 2, lines 37-40. Iizuka does not disclose, teach or suggest the claimed use of dielectric gel and provides no motivation to combine with references using dielectric gel. Onoda fails to disclose sealing resin in the mating connector or cluster block assembly which, as is explicitly noted by Onoda, is not shown in the FIGS. See Onoda, Col. 1, lines 33-37 and 49-52. Similarly, Mattis discloses gel in only the terminal block 10 and not in module or cluster block 16. See Mattis, FIG. 1 and 4. Katoh does not suggest substantially filling a cavity and substantially all free volume with a solid dielectric material. Katoh teaches away from using a solid material because it would prevent the terminals from being detachable from the housing. Okabe does not teach or suggest substantially filling the free volume and cavity with a solid material, and discourages using such a material because it would eliminate the desired flexing of the female terminal.

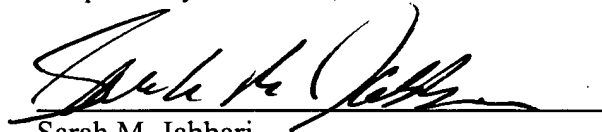
Application No. 09/848,940
Amendment dated June 24, 2004
Reply to Office Action dated March 24, 2004

For these reasons, claim 21 and its dependent claims 22-27 are patentable over the cited references.

The application, as amended, is now in allowable form. Applicant respectfully requests that a timely Notice of Allowance be issued in this application.

In the event Applicant has overlooked the need for any extension of time or payment of fee, Applicant hereby petitions therefor and authorizes that any charges be made to Deposit Account No. 02-0385, Baker & Daniels. Should the Examiner have any further questions regarding any of the foregoing, the Examiner is respectfully invited to telephone the undersigned at (317) 237-1130.

Respectfully submitted,



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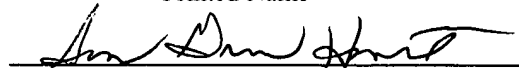
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club sandwich • cobra

club sandwich *n*: a sandwich of three slices of bread with two layers of meat (as turkey) and lettuce, tomato, and mayonnaise

club soda *n*: SODA WATER

cluck *v* *klök* *n*: the call of a hen esp. to her chicks — **cluck** *vb*

clue *v* *klü* *n*: something that guides through an intricate procedure or maze; *esp*: a piece of evidence leading to the solution of a problem

clue *vb* *klüd*; **clue-ing** or **clu-ing**: to provide with a clue; *also*: to give information to (~ me in)

clump *v* *klämp* *n* 1: a group of things clustered together 2: a heavy tramping sound

clump *vb*: to tread clumsily and noisily

clumsy *v* *kläm-zè* *adj* **clumsier**; **-est** 1: lacking dexterity, nimbleness, or grace 2: not tactful or subtle

— **clumsily** *v* *zè-lè* *adv* — **clumsiness** *v* *zè-näs* *n*

clung *past* and *past part* of **CLING**

clunker *v* *klæg-kär* *n* 1: a dilapidated automobile 2: a notable failure

cluster *v* *kläs-tär* *n*: GROUP, BUNCH

cluster *vb*: to grow or gather in a cluster

clutch *v* *kläch* *vb*: to grasp with or as if with the hand

clutch *n* 1: the claws or a hand in the act of grasping; *also*: CONTROL, POWER 2: a device for gripping an object 3: a coupling used to connect and disconnect a driving and a driven part of a mechanism; *also*: a lever or pedal operating such a coupling 4: a crucial situation

clutch *adj*: made, done, or successful in a crucial situation

clutch *n* 1: a nest or batch of eggs; *also*: a brood of chicks 2: GROUP, BUNCH

clutter *v* *klä-tär* *vb*: to fill or cover with a disorderly scattering of things

clutter *n*: a crowded mass

cm *abbr* centimeter

CM *abbr* [Commonwealth of the Northern Mariana Islands] Northern Mariana Islands

cmdr *abbr* commander

cml *abbr* commercial

CMSgt *abbr* chief master sergeant

CNO *abbr* chief of naval operations

CNS *abbr* central nervous system

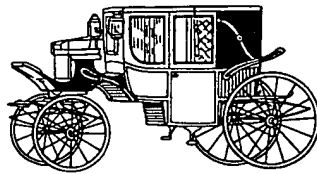
co *abbr* 1 company 2 county

Co *symbol* cobalt

CO *abbr* 1 Colorado 2 commanding officer 3 conscientious objector

c/o *abbr* care of

coach *v* *köch* *n* 1: a large closed 4-wheeled carriage with an elevated outside front seat for the driver 2: a railroad passenger car esp. for day travel 3: BUS 4: a private tutor; *also*: one who instructs or trains a team of performers



coach 1

coach *vb*: to instruct, direct, or prompt as a coach

coach-man *v* *män* *n*: a man who drives a coach or carriage

co-ad-jutor *v* *kö-a-jü-tär*, *kö-a-jä-tär* *n*: ASSISTANT; *esp*: an assistant bishop having the right of succession

co-ag-u-lant *v* *kö-a-gyè-lant* *n*: something that produces coagulation

co-ag-u-late *v* *lät* *vb* **-lat-ed**; **-lat-ing**: CLOT — **co-ag-u-lation** *v* *kö-a-gyè-lä-shän* *n*

coal *v* *köl* *n* 1: EMBER 2: a black solid combustible mineral used as fuel

coal *vb* 1: to supply with coal 2: to take in coal

co-a-lesce *v* *kö-a-les* *vb* **co-a-lesced**; **co-a-lesc-ing**: to grow together; *also*: FUSE syn merge, blend, mingle, mix — **co-a-les-cence** *v* *ns* *n*

coal-field *v* *köl-fēld* *n*: a region rich in coal deposits

coal gas *n*: gas from coal; *esp*: gas distilled from bituminous coal and used for heating

co-a-li-tion *v* *kö-a-li-shän* *n*: UNION; *esp*: a temporary union for a common purpose — **co-a-li-tion-ist** *n*

coal oil *n*: KEROSENE

coal tar *n*: tar distilled from bituminous coal and used in dyes and drugs

co-an-chor *v* *kö-äg-kär* *n*: a newscaster who shares the duties of head broadcaster

coarse *v* *körs* *adj* **coarser**; **coars-est** 1: of ordinary or inferior quality 2: composed of large parts or particles (~ sand) 3: CRUDE (~ manners) 4: ROUGH, HARSH — **coars-ly** *adv* — **coars-ness** *n*

coars-en *v* *körs-ən* *vb*: to make or become coarse

coast *v* *köst* *n* [ME *cost*, fr. MF *coste*, fr. L *costa* rib, side] 1: SEASHORE 2: a slide down a slope 3: the immediate area of view — used in the phrase *the coast is clear* — **coast-al** *adj*

coast *vb* 1: to sail along the shore 2: to move (as downhill on a sled) without effort

coaster *n* 1: one that coasts 2: a shallow container or a plate or mat to protect a surface

coaster brake *n*: a brake in the hub of the rear wheel of a bicycle

coast guard *n*: a military force employed in guarding or patrolling a coast — **coast-guards-man** *v* *köst-gärdz-män* *n*

coast-line *v* *köst-lin* *n*: the outline or shape of a coast

coat *v* *köt* *n* 1: an outer garment for the upper part of the body 2: an external growth (as of fur or feathers) on an animal 3: a covering layer — **coat-ed** *v* *kö-täd* *adj*

coat *vb*: to cover usu. with a finishing or protective coat

coat-ing *v* *kö-tig* *n*: COAT, COVERING

coat of arms: the heraldic bearings (as of a person) usu. depicted on an escutcheon

coat of mail: a garment of metal scales or rings worn as armor

co-au-thor *v* *kö-ö-thär* *n*: a joint or associate author — **co-author** *vb*

coax *v* *köks* *vb*: WHEEDLE; *also*: to gain by gentle urging or flattery

co-ax-i-al *v* *kö-äk-sè-əl* *adj*: having coincident axes — **co-ax-i-al-ly** *adv*

coaxial cable *n*: a cable that consists of a tube of electrically conducting material surrounding a central conductor

cob *v* *käb* *n* 1: a male swan 2: CORN-COB 3: a short-legged stocky horse

co-balt *v* *kö-bölt* *n* [G *Kobalt*, alter. of *Kobold*, lit., goblin; fr. its occurrence in silver ore, believed to be due to goblins] a tough shiny silver-white magnetic metallic chemical element found with iron and nickel — see ELEMENT table

cob-ble *v* *kä-bäl* *vb* **cob-bled**; **cob-bling**: to make or put together roughly or hastily

cob-ble *v* *kä-blär* *n* 1: a mender or maker of shoes 2: a deep-dish fruit pie with a thick crust

cob-ble-stone *v* *kä-bäl-stön* *n*: a naturally rounded stone larger than a pebble and smaller than a boulder

co-bra *v* *kö-brä* *n* [Pg *cobra* (*de capello*), lit., hooded snake] any of several venomous snakes of Asia and Africa that when excited expand the skin of the neck into a broad hood

fiesta • fill in

fi-es-ta \fē-'es-tə/ *n* [Sp] : FESTIVAL
fife \fif/ *n* [G Pfeife pipe, fife] : a small flute
FIFO *abbr* first in, first out
fif-teen \fif-'tēn/ *n* : one more than 14 — **fifteen** *adj*
or pron — **fifteenth** \-'tēnth/ *adj* *or n*
fifth \fifth/ *n* 1 : one that is number five in a countable
series 2 : one of five equal parts of something 3 : a
unit of measure for liquor equal to 1/5 U.S. gallon
(0.757 liter) — **fifth** *adj* *or adv*
fifth column *n* : a group of secret supporters of a na-
tion's enemy that engage in espionage or sabotage
within the country — **fifth columnist** *n*
fifth wheel *n* : one that is unnecessary and often bur-
densome
fifty \fif-tē/ *n, pl* fifties : five times 10 — **fif-ti-eth**
\-'tē-əth/ *adj* *or n* — **fifty** *adj* *or pron*
fifty-fifty \fif-tē-'fif-tē/ *adj* 1 : shared equally (a ~
proposition) 2 : half favorable and half unfavorable
fig \fig/ *n* : a usu. pear-shaped edible fruit of warm re-
gions; *also* : a tree related to the mulberry that bears
this fruit

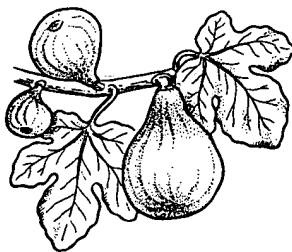


fig: leaves and fruit

fig *abbr* 1 figurative: figuratively 2 figure
fight \fit/ *vb* fought \fōt/; **fighting** 1 : to contend
against another in battle or physical combat 2 : BOX
3 : to put forth a determined effort 4 : STRUGGLE,
CONTENT 5 : to attempt to prevent the success or ef-
fectiveness of 6 : WAGE 7 : to gain by struggle
fight *n* 1 : a hostile encounter : BATTLE 2 : a boxing
match 3 : a verbal disagreement 4 : a struggle for a
goal or an objective 5 : strength or disposition for
fighting (full of ~)
fighter \fi-tər/ *n* 1 : one that fights; *esp* : WARRIOR 2
: BOXER 3 : a fast maneuverable warplane for destroy-
ing enemy aircraft
figment \fig-mənt/ *n* : something imagined or made
up
fig-u-ra-tion \fi-gyā-'rā-shən, -gā-/ *n* 1 : FORM, OUT-
LINE 2 : an act or instance of representation in figures
and shapes
fig-u-ra-tive \fi-gyā-'rā-tiv, -gā-/ *adj* 1 : EMBLEMATIC 2
: SYMBOLIC, METAPHORICAL (~ language) — **fig-u-**
ra-tive-ly *adv*
fig-ure \fi-gyər, -gār-/ *n* 1 : NUMERAL 2 *pl* : arithmet-
ical calculations 3 : a written or printed character 4
: PRICE, SUM 5 : a combination of points, lines, or sur-
faces in geometry (a circle is a closed plane ~) 6
: SHAPE, FORM, OUTLINE 7 : the graphic representa-
tion of a form *esp*. of a person 8 : a diagram or pic-
torial illustration of textual matter 9 : PATTERN,
DESIGN 10 : appearance made or impression produced
(they cut quite a ~) 11 : a series of movements (as in
a dance) 12 : PERSONAGE
figure *vb* **fig-ured**; **fig-ur-ing** 1 : to represent by or as
if by a figure or outline 2 : to decorate with a pattern
3 : to indicate or represent by numerals 4 : REGARD,
CONSIDER 5 : to be or appear important or conspic-
uous 6 : COMPUTE, CALCULATE
fig-ure-head \fi-gyər-'hed, -gār-/ *n* 1 : a figure on the

bow of a ship 2 : a head or chief in name only
figure of speech : a form of expression (as a simile or
metaphor) that often compares or identifies one thing
with another to convey meaning or heighten effect
figure out *vb* 1 : FIND OUT, DISCOVER 2 : SOLVE
fig-u-rine \fi-gyā-'rēn, -gā-/ *n* : a small carved or
molded figure
Fiji-an \fē-'jē-ən, fi-'jē-ən/ *n* : a native or inhabitant
of the Pacific island country of Fiji — **Fijian** *adj*
fil-a-ment \fi-lā-mənt/ *n* : a fine thread or threadlike
object, part, or process — **fil-a-men-tous** \fi-lā-
'men-təs/ *adj*
fil-bert \fil-bərt/ *n* : the sweet thick-shelled nut of ei-
ther of two European hazels; *also* : a shrub or small
tree bearing filberts
filch \filch/ *vb* : to steal furtively
file \fil/ *n* : a usu. steel tool with a ridged or toothed
surface used *esp*. for smoothing a hard substance
file *vb* **filed**; **fil-ing** : to rub, smooth, or cut away with
a file
file *vb* **filed**; **fil-ing** [ME, fr. MF *filer* to string docu-
ments on a string or wire, fr. *fil* thread, fr. L *filum*] 1
: to arrange in order 2 : to enter or record officially
or as prescribed by law (~ a lawsuit) 3 : to send
(copy) to a newspaper
file *n* 1 : a device (as a folder or cabinet) by means of
which papers may be kept in order 2 : a collection of
papers or publications usu. arranged or classified 3
: a collection of data (as text) treated by a computer
as a unit
file *n* : a row of persons, animals, or things arranged
one behind the other
file *vb* **filed**; **fil-ing** : to march or proceed in file
fil-et \fi-lət, in sense 2 fi-'lā, 'fi-(s)lā/ *n, pl* filets *mi-*
gnons \-(s)lā-mən-'yōz, -lā-/ [F, lit., dainty fillet] : a
thick slice of beef cut from the narrow end of a beef
tenderloin
fil-ial \fi-lē-əl, 'fil-yəl/ *adj* : of, relating to, or befitting
a son or daughter
fil-i-bus-ter \fi-lā-'bəs-tər/ *n* [Sp *filibustero*, lit., free-
booter] 1 : a military adventurer; *esp* : an American
engaged in fomenting 19th century Latin American
uprisings 2 : the use of delaying tactics (as extremely
long speeches) *esp*. in a legislative assembly; *also*
: an instance of this practice — **filibuster** *vb* — **fil-**
i-bus-ter-er *n*
fil-i-gree \fi-lā-'grē/ *n* [F *filigrane*] : ornamental open-
work (as of fine wire) — **fil-i-greed** \-'grēd/ *adj*
fil-ing \fi-lig/ *n* 1 : the act or instance of using a file
2 : a small piece scraped off by a file (iron ~s)
Fil-i-pi-no \fi-lā-'pē-nō/ *n, pl* Filipinos : a native or in-
habitant of the Philippines — **Filipino** *adj*
fill \fil/ *vb* 1 : to make or become full 2 : to stop up
: PLUG (~ a cavity) 3 : FEED, SATIATE 4 : SATISFY,
FULFILL (~ all requirements) 5 : to occupy fully 6 : to
spread through (laughter ~ed the room) 7 : OCCUPY
(~ the office of president) 8 : to put a person in (~
a vacancy) 9 : to supply as directed (~ a prescrip-
tion)
fill *n* 1 : a full supply; *esp* : a quantity that satisfies or
satiates 2 : material used *esp*. for filling a low place
fill-er \fi-lər/ *n* 1 : one that fills 2 : a substance added
to another substance (as to increase bulk or weight)
3 : a material used for filling cracks and pores in wood
before painting
fill-er \fi-lər/ *n, pl* fillers or filler — see *forint* at
MONEY table
fil-lét \fi-lət, in sense 2 fi-'lā, 'fi-(s)lā/ *n* *also* **fi-lét** \fi-
'lā, 'fi-(s)lā/ [ME *filet*, fr. MF, dim. of *fil* thread] 1
: a narrow band, strip, or ribbon 2 : a piece or slice
of boneless meat or fish; *esp* : the tenderloin of beef
fil-lét \fi-lət, in sense 2 *also* fi-'lā, 'fi-(s)lā/ *vb* 1 : to
bind or adorn with or as if with a fillet 2 : to cut into
fillets
fill *in* *vb* 1 : to provide necessary or recent information
2 : to serve as a temporary substitute